COLORADO DISCHARGE PERMIT SYSTEM (CDPS)
FACT SHEET FOR PERMIT NUMBER CO0030449
WEST MONTROSE SANITATION DISTRICT, WEST MONTROSE SD WWTF
MONTROSE COUNTY

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I. TYPE OF PERMIT

A. Permit Type: Domestic - Minor Municipal, Mechanical Plant, Seventh Renewal

B. Discharge To: Surface Water

II. FACILITY INFORMATION

A. SIC Code: 4952 Sewerage Systems

B. Facility Classification: Class B per Section 100.5.2 of the Water and Wastewater Facility Operator Certification Requirements

C. Facility Location: Latitude: 38° 30' 37" N, Longitude: 107° 54' 59" W

D. Permitted Feature: 001A, following disinfection and prior to mixing with the receiving stream. 38° 30' 37" N, 107° 54' 59" W

The location provided above will serve as the point of compliance for this permit and it is appropriate as it is located after all treatment and prior to discharge to the receiving water.

E. Facility Flows: **0.7** MGD

F. Major Changes From Last Renewal:

- Approved TMDL with waste load allocation for selenium implemented
- Segment changed from Use Protected to Undesignated resulting to antidegradation review.
- Implementation of a more stringent *E. Coli* requirement due to changes in segment from COGUUN04b (Recreation N) to COGUUN04a (Recreation E).
- Compliance schedule for *E. Coli.*
- Monitoring for total inorganic nitrogen, due to water supply classification.

III. RECEIVING STREAM

A. Waterbody Identification: *COGUUN04a, Uncompahgre River*

B. Water Quality Assessment:

An assessment of the stream standards, low flow data, and ambient stream data has been performed to determine the assimilative capacities for *Uncompahgre River* for potential pollutants of concern. This information, which is contained in the Water Quality Assessment (WQA) for this receiving stream(s), also includes an antidegradation review, where appropriate. The Division's Permits Section has reviewed the assimilative capacities to determine the appropriate water quality-based effluent limitations as well as potential limits based on the antidegradation evaluation, where applicable. The limitations based on the assessment and other evaluations conducted as part of this fact sheet can be found in Part I.A of the permit.

Permitted Feature *001A* will continue to be the authorized discharge point to the receiving stream.

IV. FACILITY DESCRIPTION

A. Infiltration/Inflow (I/I)

No infiltration/inflow problems have been documented in the service area.

B. Lift Stations

There are no lift stations in the service area.

C. Chemical Usage

The permittee did not specify any chemicals for use in waters that may be discharged. On this basis, no chemicals are approved under this permit. Prior to use of any applicable chemical, the permittee must submit a request for approval that includes the most current Material Safety Data Sheet (MSDS) for that chemical. Until approved, use of any chemical in waters that may be discharged could result in a discharge of pollutants not authorized under the permit. Also see Part II.A.1. of the permit.

Chemicals deemed acceptable for use in waters that will or may be discharged to waters of the State are acceptable only when used in accordance with all state and federal regulations, and in strict accordance with the manufacturer's site-specific instructions.

D. Treatment Facility, Facility Modifications and Capacities

The facility consists of sequencing batch reactor (SBR), activated sludge and UV disinfection. The permittee has not performed any construction at this facility that would change the hydraulic capacity of 0.7 MGD or the organic capacity of 1968 lbs BOD_5/day, which were specified in Site Approval 4578. That document should be referred to for any additional information.

Pursuant to Section 100.5.2 of the Water and Wastewater Facility Operator Certification Requirements, this facility will require a Class B certified operator.

E. Biosolids Treatment and Disposal

Sludge generated by the SBR treatment facility is wasted into aerated stabilization ponds. The plan is to get a contractor to haul the stabilized sludge and apply the digested sludge for beneficial use.

1. EPA General Permit

   EPA Region 8 issued a General Permit (effective October 19, 2007) for Colorado facilities whose operations generate, treat, and/or use/dispose of sewage sludge by means of land application, landfill, and surface disposal under the National Pollutant Discharge Elimination System. All Colorado facilities are required to apply for and to obtain coverage under the EPA General Permit.

2. Biosolids Regulation (Regulation No. 64, Colorado Water Quality Control Commission)

   While the EPA is now the issuing agency for biosolids permits, Colorado facilities that land apply biosolids must comply with requirements of Regulation No. 64, such as the submission of annual reports as discussed later in this factsheet.

V. PERFORMANCE HISTORY

A. Monitoring Data

1. Discharge Monitoring Reports – The following tables summarize the effluent data reported on the Discharge Monitoring Reports (DMRs) for the previous permit term, from a period of DMR review from August 2009 through October 2012.

Table V-1 – Summary of DMR Data for Permitted Feature 001A

Parameter	*# Samples or Reporting Periods*	*Reported Average Concentrations Avg/Min/Max*	*Reported Maximum Concentrations Avg/Min/Max*	*Previous Avg/Max/AD Permit Limit*	*Number of Limit Excursions*
Effluent Flow (MGD)	*39*	*0.29/0.19/0.39*	*0.37/0.24/0.54*	*0.7/NA*	
Temp Daily Max (°C) March-Nov*	*29*		*17/10/22*	*Report*	
Temp Daily Max (°C) Dec-Feb*	*9*		*8.1/6.4/10*	*Report*	
Temp MWAT (°C) March-Nov*	*29*	*17/9.3/22*		*Report*	
Temp MWAT (°C) Dec-Feb*	*9*	*7.5/5.8/9.7*		*Report*	
*pH (su)***	*51*	*7.4/7.2/7.7*	*7.7/7.4/8*	*6.5 - 9*	
E. coli (#/100 ml)	*40*	*199/28/1001*	*635/127/2450*	*2000/4000*	
TRC (mg/l)	*0*	*NA/NA/NA*	*NA/NA/NA*	*0.059/0.092*	
NH3 as N, Tot (mg/l) Jan	*4*	*0.43/0.12/1.1*	*0.43/0.12/1.1*	*11.6/17.1*	
NH3 as N, Tot (mg/l) Feb	*3*	*0.72/0.15/1.6*	*0.72/0.15/1.6*	*11.1/16*	
NH3 as N, Tot (mg/l) Mar	*3*	*1.3/0.17/3*	*1.3/0.17/3*	*9.3/13.5*	
NH3 as N, Tot (mg/l) Apr	*3*	*0.78/0.25/1.5*	*1.1/0.25/1.5*	*8.7/14.4*	
NH3 as N, Tot (mg/l) May	*3*	*0.76/0.1/1.2*	*0.76/0.1/1.2*	*16.2/30*	
NH3 as N, Tot (mg/l) Jun	*3*	*0.21/0.1/0.34*	*0.21/0.1/0.34*	*22/41*	
NH3 as N, Tot (mg/l) Jul	*3*	*0.58/0.1/1.4*	*0.58/0.1/1.4*	*21/37*	
NH3 as N, Tot (mg/l) Aug	*4*	*0.12/0.1/0.19*	*0.12/0.1/0.19*	*14.3/28*	
NH3 as N, Tot (mg/l) Sep	*4*	*0.13/0.1/0.2*	*0.13/0.1/0.2*	*8.5/21*	
NH3 as N, Tot (mg/l) Oct	*4*	*0.37/0.1/1.2*	*0.37/0.1/1.2*	*9.2/17.5*	
NH3 as N, Tot (mg/l) Nov	*3*	*0.17/0.1/0.25*	*0.17/0.1/0.25*	*10.6/14.5*	
NH3 as N, Tot (mg/l) Dec	*3*	*1.1/0.1/3.2*	*1.6/0.1/4.6*	*10.7/14.1*	
BOD5, effluent (mg/l)	*13*	*3/2/6*	*4.2/2/11*	*30/45/*	
BOD5 (% removal)	*13*	*99/99/99*	*NA/NA/NA*	*85*	
TSS, effluent (mg/l)	*13*	*2.8/1/7*	*4.2/1/10*	*30/45/*	
TSS (% removal)	*13*	*99/98/99*	*NA/NA/NA*	*85*	
Oil and Grease (mg/l)	*51*	*NA/NA/NA*	*0/0/0*	*NA/10/*	
TDS (mg/l)		*//*	*//*	*NA/NA/*	
PWS intake (mg/l)	*23*	*155/123/200*	*155/123/200*	*Report/Report/*	
WWTF effluent (mg/l)	*23*	*574/426/690*	*574/426/690*	*Report/Report/*	
Se, Dis (µg/l)	*40*	*1.3/0.2/3.7*	*1.3/0.2/3.7*	*Report/Report*	

**The temperature data shows the MWAT values in the "average" column, and the daily maximum reported values in the "maximum" column.*

***The pH data shows the minimum reported values in the "average" column, and the maximum reported values in the "maximum" column.*

B. Compliance With Terms and Conditions of Previous Permit

1. Effluent Limitations – The data shown in the preceding table indicates compliance with the numeric limitations of the previous permit.

   In accordance with 40 CFR Part 122.41(a), any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.

VI. DISCUSSION OF EFFLUENT LIMITATIONS

A. Regulatory Basis for Limitations

1. Technology Based Limitations

   a. Federal Effluent Limitation Guidelines – The Federal Effluent Limitation Guidelines for domestic wastewater treatment facilities are the secondary treatment standards. These standards have been adopted into, and are applied out of, Regulation 62, the Regulations for Effluent Limitations.

   b. Regulation 62: Regulations for Effluent Limitations – These Regulations include effluent limitations that apply to all discharges of wastewater to State waters and are shown in Section VIII of the WQA. These regulations are applicable to the discharge from the West Montrose Sanitation District WWTF.

2. Numeric Water Quality Standards - The WQA contains the evaluation of pollutants limited by water quality standards. The mass balance equation shown in Section VI of the WQA was used for most pollutants to calculate the potential water quality based effluent limitations (WQBELs), M_2, that could be discharged without causing the water quality standard to be violated. For ammonia, the AMMTOX Model was used to determine the maximum assimilative capacity of the receiving stream. A detailed discussion of the calculations for the maximum allowable concentrations for the relevant parameters of concern is provided in Section V of the Water Quality Assessment developed for this permitting action.

   The maximum allowable effluent pollutant concentrations determined as part of these calculations represent the calculated effluent limits that would be protective of water quality. These are also known as the water quality-based effluent limits (WQBELs). Both acute and chronic WQBELs may be calculated based on acute and chronic standards, and these may be applied as daily maximum (acute) or 30-day average (chronic) limits.

3. Narrative Water Quality Standards - Section 31.11(1)(a)(iv) of The Basic Standards and Methodologies for Surface Waters (Regulation No. 31) includes the narrative standard that State surface waters shall be free of substances that are harmful to the beneficial uses or toxic to humans, animals, plants, or aquatic life.

   a. Whole Effluent Toxicity - The Water Quality Control Division has established the use of WET testing as a method for identifying and controlling toxic discharges from wastewater treatment facilities. WET testing is being utilized as a means to ensure that there are no discharges of pollutants "in amounts, concentrations or combinations which are harmful to the beneficial uses or toxic to humans, animals, plants, or aquatic life" as required by Section 31.11 (1) of the Basic Standards and Methodologies for Surface Waters. The requirements for WET testing are being implemented in accordance with Division policy, Implementation of the Narrative Standard for Toxicity in Discharge Permits Using Whole Effluent Toxicity (Sept 30, 2010). Note that this policy has recently been updated and the permittee should refer to this document for additional information regarding WET.

4. Water Quality Regulations, Policies, and Guidance Documents

a. Antidegradation - Since the receiving water is Undesignated, an antidegradation review is required pursuant to Section 31.8 of The Basic Standards and Methodologies for Surface Water. As set forth in Section VII of the WQA, an antidegradation evaluation was conducted for pollutants when water quality impacts occurred and when the impacts were significant. Based on the antidegradation requirements and the reasonable potential analysis discussed above, antidegradation-based average concentrations (ADBACs) may be applied.

According to Division procedures, the facility has three options related to antidegradation-based effluent limits: (1) the facility may accept ADBACs as permit limits (see Section VII of the WQA); (2) the facility may select permit limits based on their non-impact limit (NIL), which would result in the facility not being subject to an antidegradation review and thus the antidegradation-based average concentrations would not apply (the NILs are also contained in Section VII of the WQA); or (3) the facility may complete an alternatives analysis as set forth in Section 31.8(3)(d) of the regulations which would result in alternative antidegradation-based effluent limitations.

The effluent must not cause or contribute to an exceedance of a water quality standard and therefore the WQBEL must be selected if it is lower than the NIL. Where the WQBEL is not the most restrictive, the discharger may choose between the NIL or the ADBAC: the NIL results in no increased water quality impact; the ADBAC results in an "insignificant" increase in water quality impact. The ADBAC limits are imposed as two-year average limits.

b. Antibacksliding – As the receiving water is designated Reviewable and the Division has performed an antidegradation evaluation, in accordance with the Antidegradation Guidance, the antibacksliding requirements in Regulation 61.10 have been met.

c. Determination of Total Maximum Daily Loads (TMDLs) – This factsheet and the accompanying permit include TMDLs developed as specified in Total Maximum Daily Load Assessment for Gunnison River and Tributaries, Uncompahgre River and Tributaries and the corresponding waste load allocations (WLAs) for selenium. As required under the Clean Water Act Section 303(d), these TMDLs have been submitted, through the normal public notification process, to EPA Region VIII for their review and approval, and were approved on February 14, 2011. The WLA for the TMDL 0.048 lbs/day for selenium will be imposed upon the effective date of the permit.

d. Colorado Mixing Zone Regulations – Pursuant to section 31.10 of The Basic Standards and Methodologies for Surface Water, a mixing zone determination is required for this permitting action. The Colorado Mixing Zone Implementation Guidance, dated April 2002, identifies the process for determining the meaningful limit on the area impacted by a discharge to surface water where standards may be exceeded (i.e., regulatory mixing zone). This guidance document provides for certain exclusions from further analysis under the regulation, based on site-specific conditions.

The guidance document provides a mandatory, stepwise decision-making process for determining if the permit limits will not be affected by this regulation. Exclusion, based on Extreme Mixing Ratios, may be granted if the ratio of the facility design flow to the chronic low flow (30E3) is greater than 2 or if the ratio of the chronic low flow to the design flow is greater than 20:1. Since the ratio of the chronic low flow to the design flow is 31:1 the permittee is eligible for an exclusion from further analysis under the regulation

e. Salinity Regulations – In compliance with the Colorado River Salinity Standards and the Colorado Discharge Permit System Regulations, the permittee shall monitor for total dissolved solids on a **Quarterly** basis. Samples shall be taken at Permitted Feature 001A.

An evaluation of the discharge of total dissolved solids indicates that the West Montrose Sanitation District facility does not exceed the threshold of 1 ton/day or 350 tons/year of salinity. To determine the TDS loading from this facility, the average reported TDS values were multiplied by the average flow, then by 8.34. The average was determined to be 0.7 tons/day

f. Reasonable Potential Analysis – Using the assimilative capacities contained in the WQA, an analysis must be performed to determine whether to include the calculated assimilative capacities as WQBELs in the permit. This reasonable potential (RP) analysis is based on the Determination of the Requirement to Include Water Quality Standards-Based Limits in CDPS Permits Based on Reasonable Potential, dated December, 2002. This guidance document utilizes both quantitative and qualitative approaches to establish RP depending on the amount of available data.

A qualitative determination of RP may be made where ancillary and/or additional treatment technologies are employed to reduce the concentrations of certain pollutants. Because it may be anticipated that the limits for a parameter could not be met without treatment, and the treatment is not coincidental to the movement of water through the facility, limits may be included to assure that treatment is maintained.

A qualitative RP determination may also be made where a federal ELG exists for a parameter, and where the results of a quantitative analysis results in no RP. As the federal ELG is typically less stringent than a limitation based on the WQBELs, if the discharge was to contain concentrations at the ELG (above the WQBEL), the discharge may cause or contribute to an exceedance of a water quality standard.

To conduct a quantitative RP analysis, a minimum of 10 effluent data points from the previous 5 years, should be used. The equations set out in the guidance for normal and lognormal distribution, where applicable, are used to calculate the maximum estimated pollutant concentration (MEPC). For data sets with non-detect values, and where at least 30% of the data set was greater than the detection level, MDLWIN software is used consistent with Division guidance to generate the mean and standard deviation, which are then used to establish the multipliers used to calculate the MEPC. If the MDLWIN program cannot be used the Division's guidance prescribes the use of best professional judgment.

For some parameters, recent effluent data or an appropriate number of data points may not be available, or collected data may be in the wrong form (dissolved vs total) and therefore may not be available for use in conducting an RP analysis. Thus, consistent with Division procedures, monitoring will be required to collect samples to support a RP analysis and subsequent decisions for a numeric limit. A compliance schedule may be added to the permit to require the request of an RP analysis once the appropriate data have been collected.

For other parameters, effluent data may be available to conduct a quantitative analysis, and therefore an RP analysis will be conducted to determine if there is RP for the effluent discharge to cause or contribute to exceedances of ambient water quality standards. The guidance specifies that if the MEPC exceeds the maximum allowable pollutant concentration (MAPC), limits must

be established and where the MEPC is greater than half the MAPC (but less than the MAPC), monitoring must be established. Table VI-1 contains the calculated MEPC compared to the corresponding MAPC, and the results of the reasonable potential evaluation, for those parameters that met the data requirements. The RP determination is discussed for each parameter in the text below.

Table VI-1 – Reasonable Potential Analysis

Parameter	30-Day Average			7-Day Ave or Daily Max		
	MEPC	WQBEL (MAPC)	Reasonable Potential	MEPC	WQBEL (MAPC)	Reasonable Potential
E. coli (#/100 ml)	1197	610	Yes	2772	1220	Yes
TRC (mg/l)	NA	0.059	Yes (Qual)	NA	0.092	Yes (Qual)
Nitrate/TIN as N (mg/l)	NA			NA	46	Monitor
Nitrite as N (mg/l)	NA			NA	2.4	Monitor
NH3 as N, Tot (mg/l) Jan	3.9	18	Yes (Qual)	3.9	24	Yes (Qual)
NH3 as N, Tot (mg/l) Feb	4.6	18	Yes (Qual)	4.6	30	Yes (Qual)
NH3 as N, Tot (mg/l) Mar	3.2	13	Yes (Qual)	3.2	23	Yes (Qual)
NH3 as N, Tot (mg/l) Apr	4.6	11	Yes (Qual)	4.6	31	Yes (Qual)
NH3 as N, Tot (mg/l) May	1.2	13	Yes (Qual)	1.2	41	Yes (Qual)
NH3 as N, Tot (mg/l) Jun	0.34	21	Yes (Qual)	0.34	54	Yes (Qual)
NH3 as N, Tot (mg/l) Jul	1.4	19	Yes (Qual)	1.4	53	Yes (Qual)
NH3 as N, Tot (mg/l) Aug	0.19	18	Yes (Qual)	0.19	46	Yes (Qual)
NH3 as N, Tot (mg/l) Sep	0.81	18	Yes (Qual)	0.81	53	Yes (Qual)
NH3 as N, Tot (mg/l) Oct	1.2	6.1	Yes (Qual)	1.2	37	Yes (Qual)
NH3 as N, Tot (mg/l) Nov	0.85	9.9	Yes (Qual)	0.85	45	Yes (Qual)
NH3 as N, Tot (mg/l) Dec	7.8	17	Yes (Qual)	7.8	27	Yes (Qual)
Se, Dis (µg/l)	6.7	14	No	6.7	80	No

B. Parameter Evaluation

BOD_5 - The BOD_5 concentrations in Reg 62 are the most stringent effluent limits and are therefore applied. The removal percentages for BOD_5 also apply based on the Regulations for Effluent Limitations.

These limitations are the same as those contained in the previous permit and are imposed upon the effective date of this permit.

Total Suspended Solids - The TSS concentrations in Reg 62 are the most stringent effluent limits and are therefore applied. The removal percentages for TSS also apply based on the Regulations for Effluent Limitations.

These limitations are the same as those contained in the previous permit and are imposed upon the effective date of this permit.

Oil and Grease – The oil and grease limitations from the Regulations for Effluent Limitations are applied as they are the most stringent limitations.

This limitation is the same as those contained in the previous permit and is imposed upon the effective

date of this permit.

pH - This parameter is limited by the water quality standards of 6.5-9.0 s.u., as this range is more stringent than other applicable standards.

This limitation is the same as that contained in the previous permit and is imposed upon the effective date of this permit.

E. Coli – The limitation for E. Coli is based upon the WQBEL as described in the WQA. With the available data the log-normal program was used to determine the appropriate statistics to determine the MEPC. The MEPC was greater than the MAPC and therefore limitations are required. Limitations of 610 #/100 ml (30 day average) and 1220 #/100 ml (7-day average) have been included in the permit.

This is a more stringent limitation from the previous permit. Even though the effluent data shows that the permittee may not be able to consistently meet the new limitations, the effluent concentrations routinely fall within the range of the new WQBELs. However, since this is a more stringent limitation, and minor treatment upgrades or adjustments may be needed to consistently comply with the new limitations, an abbreviated compliance schedule has been included in the permit to give the permittee time to meet these limitations. The *E. coli* limitations of the previous permit will be the interim limits.

Total Residual Chlorine (TRC) - The limitation for TRC is based upon the WQBEL as described in the WQA. A qualitative determination of RP has been made as chlorine may be used in the treatment process. This facility uses UV disinfection, this limitation is set in place in the event of chlorine disinfection being used as an emergency back-up.

Previous monitoring as shown in Table V-1 indicate that this limitation can be met and is therefore imposed upon the effective date of the permit.

Nitrate, Nitrite / Total Inorganic Nitrogen -. There were no data to perform a quantitative RP analysis for these parameters; therefore monitoring has been added to this permit for the collection of data for future quantitative RP analysis.

Ammonia - The limitation for ammonia is based upon the WQBEL (December through March) and based on the NILs (April through November) as described in the WQA. A qualitative determination of RP has been made as ammonia is a parameter of concern for municipal wastewater treatment facilities.

Previous monitoring as shown in Table V-1 indicate that these limitations can be met and are therefore effective immediately.

Selenium, Potentially Dissolved - The RP analysis for selenium was based upon the WQBEL as calculated in the WQA. With the available data the normal program was used to determine the appropriate statistics to determine the MEPC. The MEPC was less than half of the MAPC and therefore limitations are not necessary at this time; however, the WLA for the TMDL 0.048 lbs/day for selenium will be imposed upon the effective date of the permit.

Temperature - Based on the information presented in the WQA, this facility is exempt from the temperature requirements based on flow ratio.

Organics – The effluent is not expected or known to contain organic chemicals, and therefore,

limitations for organic chemicals are not needed in this permit.

Whole Effluent Toxicity (WET) Testing – This facility does not receive a significant volume of toxic or industrial wastes, and parameters of concern are adequately controlled by specific effluent limitations.

Due to the above statements, and in accordance with Section 61.8(2)(b)(i)(B) of the Colorado Discharge Permit System Regulations, the discharge does not have the reasonable potential to cause, or measurably contribute to, an excursion above any narrative standards for water quality. Therefore, WET testing is not a requirement of this permit. However, the Division reserves the right to reopen the permit to include WET testing, should facility conditions change or if new information becomes available.

C. Parameter Speciation

Dissolved Metals / Potentially Dissolved
For metals with aquatic life-based dissolved standards, effluent limits and monitoring requirements are typically based upon the potentially dissolved method of analysis, as required under Regulation 31, Basic Standards and Methodologies for Surface Water. Thus, effluent limits and/or monitoring requirements for these metals will be prescribed as the "potentially dissolved" form.

VII. ADDITIONAL TERMS AND CONDITIONS

A. Monitoring

Effluent Monitoring – Effluent monitoring will be required as shown in the permit document. Refer to the permit for locations of monitoring points. Monitoring requirements have been established in accordance with the frequencies and sample types set forth in the Baseline Monitoring Frequency, Sample Type, and Reduced Monitoring Frequency Policy for Industrial and Domestic Wastewater Treatment Facilities. This policy includes the methods for reduced monitoring frequencies based upon facility compliance as well as for considerations given in exchange for instream monitoring programs initiated by the permittee. Table VI-2 shows the results of the reduced monitoring frequency analysis for Permitted Feature 001A, based upon compliance with the previous permit.

Based upon the reduced monitoring frequency analysis for Permitted Feature 001A, shown in Table VI-2, the permittee is not eligible for reduced monitoring for E. coli.

Table VI-2 – Monitoring Reduction Evaluation

Parameter	*Proposed Permit Limit*	*Average of 30-Day (or Daily Max) Average Conc.*	*Standard Deviation*	*Long Term Characterization (LTC)*	*Reduction Potential*
pH (su) Minimum	*min 6.5*	*7.4*	*0.15*	*7.1*	*1 Step*
pH (su) Maximum	*max 9.0*	*7.7*	*0.15*	*8*	
E. coli (#/100 ml)	*610*	*225*	*228*	*681*	*None*
NH3 as N, Tot (mg/l)	*6.1*	*1.2*	*1.5*	*4.2*	*2 Levels*
BOD5, effluent (mg/l)	*30*	*2.9*	*1.7*	*6.3*	*3 Levels*
TSS, effluent (mg/l)	*30*	*3.1*	*3.3*	*9.7*	*3 Levels*
Oil and Grease (mg/l)	*10*	*0*	*0*	*0*	*3 Levels*
Se, Dis (µg/l)	*14*	*1.4*	*0.58*	*2.56*	*3 Levels*

B. Reporting

1. Discharge Monitoring Report – The West Montrose Sanitation District facility must submit Discharge Monitoring Reports (DMRs) on a monthly basis to the Division. These reports should contain the required summarization of the test results for all parameters and monitoring frequencies shown in Part I.B of the permit. See the permit, Part I.B, C, D and/or E for details on such submission.

3. Special Reports – Special reports are required in the event of an upset, bypass, or other noncompliance. Please refer to Part II.A. of the permit for reporting requirements. As above, submittal of these reports to the US Environmental Protection Agency Region VIII is no longer required.

C. **Signatory and Certification Requirements**

Signatory and certification requirements for reports and submittals are discussed in Part I.E.6. of the permit.

D. Compliance Schedules

The following compliance schedules are included in the permit. See Part I.B of the permit for more information.

a. *E. Coli* - The permittee has been given until August 31, 2014 to comply with the required limitations for e. coli. The compliance schedule will give the permittee reasonable time to evaluate means to achieve the required permit limits.

All information and written reports required by the following compliance schedules should be directed to the Permits Section for final review unless otherwise stated.

F. Economic Reasonableness Evaluation

Section 25-8-503(8) of the revised (June 1985) Colorado Water Quality Control Act required the Division to "determine whether or not any or all of the water quality standard based effluent limitations are reasonably related to the economic, environmental, public health and energy impacts to the public and affected persons, and are in furtherance of the policies set forth in sections 25-8-192 and 25-8-104."

The Colorado Discharge Permit System Regulations, Regulation No. 61, further define this requirement under 61.11 and state: "Where economic, environmental, public health and energy impacts to the public and affected persons have been considered in the classifications and standards setting process, permits written to meet the standards may be presumed to have taken into consideration economic factors unless:

a. A new permit is issued where the discharge was not in existence at the time of the classification and standards rulemaking, or

b. In the case of a continuing discharge, additional information or factors have emerged that were not anticipated or considered at the time of the classification and standards rulemaking."

The evaluation for this permit shows that the Water Quality Control Commission, during their proceedings to adopt the Classifications and Numeric Standards for Gunnison and Lower Dolores River Basins, considered economic reasonableness.

Furthermore, this is not a new discharger and no new information has been presented regarding the classifications and standards. Therefore, the water quality standard-based effluent limitations of this permit are determined to be reasonably related to the economic, environmental, public health and energy impacts to the public and affected persons and are in furtherance of the policies set forth in Sections 25-8-102 and 104. If the permittee disagrees with this finding, pursuant to 61.11(b)(ii) of the Colorado Discharge Permit System Regulations, the permittee should submit all pertinent information to the Division during the public notice period.

VIII. REFERENCES

A. Colorado Department of Public Health and Environment, Water Quality Control Division Files, for Permit Number CO0030449.

B. "Design Criteria Considered in the Review of Wastewater Treatment Facilities", Policy 96-1, Colorado Department of Public Health and Environment, Water Quality Control Commission, April 2007.

C. Basic Standards and Methodologies for Surface Water, Regulation No. 31, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective January 31, 2013.

D. Classifications and Numeric Standards for Gunnison and Lower Dolores River Basins, Regulation No. 35, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective March 30, 2013.

E. Colorado Discharge Permit System Regulations, Regulation No. 61, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective January 1, 2012.

F. Regulations for Effluent Limitations, Regulation No. 62, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective July 30, 2012.

G. Pretreatment Regulations, Regulation No. 63, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective April 01, 2007.

H. Biosolids Regulation, Regulation No. 64, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective March 30, 2010.

I. Colorado River Salinity Standards, Regulation No. 39, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective August 30, 1997.

J. Section 303(d) List of Water Quality Limited Segments Requiring TMDLs, Regulation No 93, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective April 30, 2010.

K. Colorado's Section 303(d) List of Impaired Waters and Monitoring and Evaluation List, Regulation No 93, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective April 30, 2010.

L. Antidegradation Significance Determination for New or Increased Water Quality Impacts, Procedural Guidance, Colorado Department of Public Health and Environment, Water Quality Control Division, effective December 2001.

M. Memorandum Re: First Update to (Antidegradation) Guidance Version 1.0, Colorado Department of Public Health and Environment, Water Quality Control Division, effective April 23, 2002.

N. Determination of the Requirement to Include Water Quality Standards-Based Limits in CDPS Permits Based on Reasonable Potential, Colorado Department of Public Health and Environment, Water Quality Control Division, effective December2002.

O. The Colorado Mixing Zone Implementation Guidance, Colorado Department of Public Health and Environment, Water Quality Control Division, effective April 2002.

P. Baseline Monitoring Frequency, Sample Type, and Reduced Monitoring Frequency Policy for Domestic and Industrial Wastewater Treatment Facilities, Water Quality Control Division Policy WQP-20, May 1, 2007.

Q. Implementing Narrative Standard for Toxicity in Discharge Permits Using Whole Effluent Toxicity (WET) Testing. Colorado Department of Public Health and Environment, Water Quality Control Division Policy Permits-1, September 30, 2010.

R. Policy for Conducting Assessments for Implementation of Temperature Standards in Discharge Permits, Colorado Department of Public Health and Environment, Water Quality Control Division, Policy Number WQP-23, effective July 3, 2008.

S. Policy for Permit Compliance Schedules, Colorado Department Public Health and Environment, Water Quality Control Division Policy Number WQP-30, effective December 2, 2010.

T. Procedural Regulations for Site Applications for Domestic Wastewater Treatment Works, Regulation No. 22, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective September 30, 2009.

U. Regulation Controlling discharges to Storm Sewers, Regulation No. 65, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective May 30, 2008.

V. Water and Wastewater Facility Operator Certification Requirements, Regulation No. 100, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective September 30, 2007.

W. Total Maximum Daily Load Assessment. Gunnison River and Tributaries, Uncompahgre River and Tributaries. Delta/Mesa/Montrose Counties, Colorado. Colorado Department Public Health and Environment, January 2011.

Abigail Ogbe
05/22/2013

IX. PUBLIC NOTICE COMMENTS

The public notice period was from April 19, 2013 to May 20, 2013. Comments were received from the West Montrose Sanitation District. Topical summaries of the comments and the response of the Division are given below.

COMMENT 1: Rationale for public notice – Cover Page; E-mail address should read: wmsd-andres@qwestoffice.net

RESPONSE 1: The email address will be updated in the database. This is not a part of the permit document and so does not impact the permit.

COMMENT 2: Permit contact summary page - Legal Contact: Since we change board presidency on an annual basis and often have a change of the officers mid-term, can we simply imply the position "President- Board of Directors" as the legal contact?

RESPONSE 2: A person, not a title must be identified as the legal contact. The permittee should complete a change of contact form and send to the Division each time the permit contact changes. Please also see Regulation 61.4(1) for specific signatory requirements.

COMMENT 3: Part I, Page 4 of 28 of the permit. ICIS Code 70295 3 TDS, PWS intake (mg/l) - Request that this parameter, "sample type" be changed to "Grab" based on the fact that one source is being utilized at the raw drinking water source.

RESPONSE 3: The sample type for TDS has been changed to "grab."

COMMENT 4: PAGE 11 of 31 of the WQA, TABLE A-5, TMDL Waste Load Allocations for Selenium: Under the "Facility" tab in the table, the design flow for the "West Montrose SD WWTF" should read 0.7 MGD and the design flow for the "City of Montrose WWTF" should read 4.32 MGD.

RESPONSE 4: The error has been corrected.

Abigail Ogbe
05/22/2013